

### **BEFORE THE**

## FEDERAL ELECTION COMMISSION -7 PH 12: 39

In the matter of:

OFFICE OF GENERAL COURSEL

CAT PING FOR CONGRESS C00568774

MUR 6954

CONCERNED 7<sup>TH</sup> DISTRICT NEIGHBORS

#### COMPLAINT

Cat Ping for Congress violated the Federal Election Campaign Act by failing to comply with the disclaimer requirements for communications and solicitations paid for by an authorized political committee. The so-called group "Concerned 7<sup>th</sup> District Neighbors" violated the Act by failing to comply with the disclaimer requirements for communications either authorized by or not authorized by a candidate committee.

1. This complaint is filed with the Federal Election Commission ("FEC") in accordance with the provisions of 52 U.S.C. § 30109(a)(1) in the belief that Cat Ping for Congress ("CPC") and Concerned 7<sup>th</sup> District Neighbors ("CDN") violated the Federal Election Campaign Act of 1971, as amended, 52 U.S.C. §§ 30101 et. seq. (the "Act").

## **Violations by Cat Ping for Congress**

- 2. Whenever an authorized political committee of a candidate makes a disbursement for the purpose of financing any printed communication it must clearly state that the communication has been paid for by such authorized political committee. 52 U.S.C. § 30120(a). The "paid for by" notice is commonly referred to as the disclaimer.
- 3. Pursuant to the Act, the disclaimer for printed communications by authorized political committees shall.
  - a. Be of sufficient type size to be clearly readable by the recipient of the communication;
  - b. Be contained in a printed box set apart from the other contents of the communication; and
  - c. Be printed with a reasonable degree of color contrast between the background and the printed statement. 52 U.S.C. § 30120(c)(1)-(3).

- 4. "Cat Ping for Congress" is the name of the committee CPC registered with the FEC on September 19, 2014. See Exhibit 1 (FEC Form 1 Statement of Organization).
- 5. CPC violated 52 U.S.C. § 30120 of the Act by failing to include the required disclaimer on its website. See Exhibit 2, CPC webpage, <a href="www.catping.com">www.catping.com</a>, (accessed Nov. 2, 2014). FEC regulations specifically apply the disclaimer requirements to "all Internet websites of political committees available to the general public." 11 C.F.R. § 110.11(a)(1). Specifically, CPC violated the Act and FEC regulations by using the wrong name in the "paid for by" disclaimer. CPC says that it is paid for by the "Cat Ping for Congress Committee 2014." There is no committee registered with the FEC by that name. Second, the disclaimer is not contained in a printed box set apart from the other contents of the communication as required under the Act.
- 6. CPC violated 52 U.S.C. § 30120 by failing to include the required disclaimers on solicitations. <u>See Exhibit 3, CPC on-line solicitation page</u>, (Accessed Nov. 2, 2014). The CPC solicitation page does not include any "paid for by" disclaimer notice.
- 7. CPC violated 52 U.S.C. 30102(i) by failing to exercise best efforts to obtain, maintain, and submit contributor information required by the Act. Specifically, the "treasurer and political committee will only be deemed to have exercised best efforts to obtain, maintain and report the required [contributor] information if all written solicitations for contributions include a clear request for the contributor's full name, mailing address, occupation and name of employer, and include an accurate statement of Federal law regarding the collection and reporting of individual contributor identifications." 11 C.F.R. § 114.7(b)(1)(i). The CPC solicitation page does not include the required "best efforts" statement required by the Act and FEC regulations.

## Violations by Concerned 7<sup>th</sup> District Neighbors

- 8. CDN violated 52 U.S.C. § 30120 of the Act by failing to include the required disclaimer in a newspaper advertisement that expressly advocated the election of a federal candidate. An advertisement in the Franklin Township Informer supporting candidate Cat Ping only states that it was paid for by "Concerned 7<sup>th</sup> District Neighbors." See Exhibit 4, Advertisement, Franklin Township Informer, p. 3 (Oct. 8, 2014). Specifically, CDN violated 52 U.S.C. § 30120(a)(2) or (3) by failing to indicate if the advertisement was authorized by the candidate or not authorized by the candidate.
- 9. If the CDN advertisement was authorized by the candidate, then it is a contribution to CPC and the cost of the advertisement may violate the Act's contribution limits and source restrictions at 52 U.S.C. §§ 30116 and 30118.

- 10. If the CDN advertisement was not authorized by the candidate, then it may be an independent expenditure. If CDN made an independent expenditure then it violated 52 U.S.C. § 30120(a)(3) by failing to "clearly state the name and permanent street address, telephone number or World Wide Web address of the person who paid for the communication and state that the communication is not authorized by any candidate or candidate's committee."
- 11. CDN may have violated 52 U.S.C. § 30104(c) by failing to file an independent expenditure report with the FEC disclosing its donors and expenditures.

## Conclusion

- 12. I request that the FEC review this matter and find reason to believe that CPC and CDN violated the Act by failing to place the required disclaimers on their communications and solicitations.
- 13. In addition, I request that the FEC find reason to believe that CDN violated the Act if it made an independent expenditure and failed to file the required public disclosure reports.

Respectfully submitted,

Indianapolis, IN 46203

State of Indiana County of MARION

Signed and sworn to be fore me on No

Notary Public, State of Indiana Marion County
Commission # 653682
My Commission Expires
Mey 16, 2022

Notary Public

My commission expires: MAY 18, 7022

FEC		SBURSEN			RECEIVED
FORM 3		Authorized Comm			4 OCT 24 AM 11: 58
NAME OF COMMITTEE (in	TYPE OR PRIN		mple: If typing, typ	) 12FE4	EG MAIL CENTER
ADDRESS (number at than previor reported. (f	nd street)  fferent usly	LGRESS.  N. SHADA  LITY  3. IS THIS	SLAUD A	FINE, SULL	ZIP CODE STATE V DISTRICT
(a) Quarterly R April 19 July 15	PORT (Choose One) Reports:  5 Quarterly Report (Q1)  5 Quarterly Report (Q2)  9r 15 Quarterly Report (Q3)  y 31 Year-End Report (YE)	Election on	Primary (12P) Convention (12C)	the:  General Special	1 (128)
্বন্দু গুলুর	ation Report (TER)	1	General (30G)	Runoff	
Type or Print Name Signature of Treasure	examined this Report and to of Treasurer	the best of my know	Wedge and belief	it is true, correct	0 '23 '2014
NOTE: Submission of Office Use	falsé, erroneous, or incomp	lete information may s	ubject the person s	Igning this Report t	FEC FORM 3

FE5AND18

	FEC Form 3 (Revised 02/2003)	SUMMARY PAGE of Receipts and Disbursements	Page <b>2</b>
Wı	rite or Type Committee Name  (AT YING for Con	IGRESS	
Re	eport Covering the Period: From:	10 ' 62 ' 28 14 TO	· [75] 1257 [2873
<del></del> -	Not Contributions (other than Incon)	COLUMN A This Period	COLUMN B Election Cycle-to-Date
υ,	Net Contributions (other than loans)  (a) Total Contributions (other than loans) (from Line 11(e))	1.10000	498691
	(b) Total Contribution Refunds (from Line 20(d))	<u> </u>	
	(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))	[//	49.869
7.	Net Operating Expenditures		
	(a) Total Operating Expenditures (from Line 17)	[,473.39]	2.098.53
	(b) Total Offsets to Operating Expenditures (from Line 14)		
	(c) Net Operating Expanditures (subtract Line 7(b) from Line 7(a))	1,413.39	2,098.53
8.	Cash on Hand at Close of Reporting Period (from Line 27)	2,18.8.36	
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	11,095.00	
		For further information contact:	
		Federal Election Commission 999 E Street, NW Washington, DC 20463	
		Toll Free 800-424-9530 Local 202-694-1100	

Write	or Type Committee Name	of Receipts	Page 3
	AT PING FOR COM	GRESS	·····
Repo	rt Covering the Period: From:	7 67 2014 To:	[2] [23] [2023
	I. RECEIPTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
11. CC	ONTRIBUTIONS (other than loans) FROM:		
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	(ii) Uniternized		2,8469
	(iii) TOTAL of contributions from individuals	110000	2947,9
	Irom Individuals		
(b)	•		40.00
(c)			10000
	(such as PACs)		
(d)	•		
(e)	TOTAL CONTRIBUTIONS		
	(other than loans) (add Lines 11(a)(iii), (b), (c), and (d))	1.1.00.00	49869
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13. LC			
(a)	) Made or Guaranteed by the Candidate		
•	) All Other Loans		L_i_j
(C)	) TOTAL LOANS (add Lines 13(e) and (b))		
14. Q	FFSETS TO OPERATING		
E	KPENDITURES .		~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
(R	lefunds, Rebates, etc.)		المساور المساور المنتام مساور المساور

15. OTHER RECEIPTS

(Dividends, Interest, etc.).....

16. TOTAL RECEIPTS (add Lines 11(e), 12, 13(c), 14, and 15) (Carry Total to Line 24, page 4)......

DETAIL	En c	21 IBABA	LADV	DACE
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FEC Form 3 (Revised 02/2003)

of Disbursements

Page 4

	II. DISBURSEMENTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
17.	OPERATING EXPENDITURES	1.4/3.39	2098.5.5
18.	TRANSFERS TO OTHER AUTHORIZED COMMITTEES		
19.	LOAN REPAYMENTS: (a) Of Loans Made or Guaranteed by the Candidate		
	(b) Of All Other Loans		
20.	REFUNDS OF CONTRIBUTIONS TO:  (a) Individuals/Persons Other Than Political Committees		
	(b) Political Party Committees		
	(d) TOTAL CONTRIBUTION REFUNDS (add Lines 20(a), (b), and (c))		
21.	OTHER DISBURSEMENTS		
22.	TOTAL DISBURSEMENTS (add Lines 17, 18, 19(c), 20(d), and 21)	1.4/3.39	2098.55
_	III. CASH SU	UMMARY	
23.	CASH ON HAND AT BEGINNING OF REPO	RTING PERIOD	3.16/15
24	TOTAL RECEIPTS THIS PERIOD (from Line	16, page 3)	1.1.0000
25.	SUBTOTAL (add Line 23 and Line 24)		4.26.1.7.5
26.	TOTAL DISBURSEMENTS THIS PERIOD (fro	m Line 22)	1.4.1.3.39
27.	CASH ON HAND AT CLOSE OF REPORTIN (subtract Line 26 from Line 25)		2/8836

SCHEDULE A (FEC Form 3)

ITEMIZED RECEIPTS

FEC ID number of contributing

General

federal political committee.

Name of Employer

Primary 
Other (specify)

Receipt For:

TENIZED RECEIP 13	Detailed Summary Page	12 13a 13b 14 15
Any information copied from such Reports and Statem or for commercial purposes, other than using the name	nents may not be sold or used by any pere and address of any political committee	erson for the purpose of soliciting contributions to solicit contributions from such committee.
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Full Name (Last, First, Models Initial)		
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CITY INDIANAPOUS S	Iste Zip Code  A 40226	
FEC ID number of contributing federal political committee.	O\$568114	Amount of Each Receipt this Period
	EUDATION PRESIDENT	, ,500.00
Receipt For: Electric Frimary General Other (specify)	ction Cycle-to-Date	
Full Name (Last, First, Middle Initial)	2 7 2 7 10 0 0 0 .	Date of Receipt
B. Mailing Address	<del></del>	M-M / B-0 / V V-V-V
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FEC ID number of contributing federal political committee.	A Mark to the total of the second	Amount of Each Receipt this Period
Name of Employer Occ	cupation	and the second state, in the second
Primary General	ction Cycle-to-Date	
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C. Mailing Address		M M 1/ 10 - 9 1/ 1 V - V V V
City	tate Zip Code	· · · · · · · · · · · · · · · · · · ·

Occupation

SUBTOTAL of Receipts This Page (optional).....

TOTAL This Period (last page this line number only).....

Election Cycle-to-Date

Use separate schedule(s) for each category of the

FOR LINE NUMBER:

\_\_\_\_11b [

PAGE

Amount of Each Receipt this Period

SCHEDULE B (FEC Form 3)	Use separate schedule(s)	FOR LINE NUMBER: PAGE / OF / (check only one)		
ITEMIZED DISBURSEMENTS	for each category of the Detailed Summary Page	[2] 17		
		20a 20b 20c 21		
Any information copied from such Reports and Statements m or for commercial purposes, other than using the name and				
NAME OF COMMITTEE (In Full)				
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Full Name (Last, First, Middle Initial)		Date of Disbursement		
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Senate Primary	General	1		
State:	pecify)	ł		
Full Name (Last, First, Middle Initial)				
B. PID PRINTING		Date of Disbursement		
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City State	Zip Code	Amount of Each Disbursement this Period		
Purpose of Disbursement AM		24691		
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Candidate Numer	Category Type	′		
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Full Name (Last, First, Middle Initial)		Date of Disbursement		
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SUBTOTAL of Disbursements This Page (optional)		- maile		
TOTAL This Period (last page this line number only)				

SCHEDULE D (FEC Form 3)	(Use separate PAGE / OF /
DEBTS AND OBLIGATIONS	schedule(s) FOR LINE NUMBER:
Excluding Loans	for each (check only one) 9 numbered line)
NAME OF COMMITTEE (In Full)	
CAT VING FOR CONGRESS	•
A. Full Name (Last, First, Middle Initial) of Debtor or Creditor	Nature of Debt (Purpose):
CATHERINE "CAT" YING	Ligns for the general election (4,000 signs)
Mailing Address 5859 6. 3811 St	Eletion (4,000 mg)
City State ZUDIANA POUS IN Zip Code 46218	
Outstanding Balance Beginning This Period	
Lan 5,6 41.00	
Amount Incurred This Period Payment This Period	Outstanding Balance at Close of This Period
5,454.00	-0-11,09500
B. Full Name (Last, First, Middle Initial) of Debtor or Creditor	Nature of Debt (Purpose):
Mailing Address	
City Code	
City State , Zip Code	
Outstanding Balance Beginning This Period  Amount Incurred This Period  Payment This Period	Outstanding Balance at Close of This Period
Leanne de la	<u> </u>
C. Full Name (Last, First, Middle Initial) of Debtor or Creditor	Nature of Debt (Purpose):
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1) SUBTOTALS This Period This Page (optional)	64 CH (TO)
2) TOTALS This Period (last page this line number only)	The control of the co
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)	
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page of	11.09500

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WRITE FIRMLY TO MAKE ALL COPIES LEGIBLE.

EXTREMELY URGENT Please Rush To Addressee

Schedule package pickup right from \$ --- home or office at usps.com/pickup

Print postage online - Go to usps.com/,



PLEASE PRESS FIRMLY



# Flat Rate Mailing Envelope For Domestic and International Use

Visit us at usps.com



UNITED STATES
POSTAL SERVICE •

RECEIVED
1911-007 24 MM 11: 58
FEC MAIL CENTER

When used internationally

affix customs declarations (PS Form 2976, or 2976A).

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FEDERAL Election CommissioN
999 E Street NW
WASHINGTON, DC
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For pickup or USPS Tracking*, visit USPS.com or call 900-222-1911.     2100.00 insurance included.

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Federal Election Commission ENVELOPE REPLACEMENT PAGE FOR INCOMING The FEC added this page to the end of this filing to indicate	
Hand Delivered	Date of Receipt
USPS First Class Mail	Postmarked
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(8/2013)	

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## **Cat Ping for Congress**

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the name commission have not been Apparelled and Encoding Profits



# Franklin Township

A Publication of the Franklin Township Civic League, Inc.

KINGTIMEAT YTVIEW 'ND!!

Z d'student of Small cnter, has plenty from during a recent nt View Orchard. 'it Pleasant View for ay for the kids! Don't the orchard for fresh ians and iclies to make

Send Us Your Phiolo6

Vol. 43

No. 41

8822 Southeastern Avenue, Indianapols, IN 46239

V/eek of October 8, 2014



SI Yeasi Law Enforcement (Alexau) Served terrospoeta Afem Contro United Street Coronol (Alexau) Tobago (Iligamaganii Enjesivi). 27 viet

As Vous Sheries Own

In 1971. The Frunklin Township Civic League (FICL) started as an idea in someone's fiving facing to help the then agrarian community prepare for becoming part of "the big city." 43 years later, Franklin Township has changed a tor!

But one thing that remains steadfast is co nity spirit.

So why join the Franklin Township Civic League? Why do you want to receive the Informer newspa per every week?

Receive the Informer each week with news about school and church activities, notice runs, land use more ... Look through this special issue for just a

small somaline of what the Informer offers And that's not all your \$33 will do. You! mbership dollars will also help:

The Community Christmas Drive.... See page 11 Provide a large meeting space at 130 charge to other not-for-profit community groups... See page 5 Keep the Community Informed about appropriate coming and land use matters..... See page 13 Support school activities and programs... See page

Recognize outstanding valuaters == Ner page 13
Pind out more about what membership in the Civis Pind out more about what memore only in page league means to you and the community on page The Frankfin Township Civic League Board of Directors

Invites you to be a part of The 6th Annual Fundraiser Dinner Gala and Reverse Raffle Saturday, November 1, 2014

6 'p:m.to 9 p.m., Dinner served at 6:30 p.m. Presented it The Atrium - 3143 East Thompson Road . \$75, per couple includes.

Unitry in Reverse Ruffle - Grand Price \$3000 (west of so wide for Roffle - need not be present to only

Buffet Dinner and Dessett for Two \$25 Dinner only ticket inleudes: Buffet Dinner and Dessent for One

Master of Ceremonies - Steve Jeffris

Silent Auction and 50/30 Raffles for evenune's enjoyment

contact the Chric League office at 862-1774 or lobal net or any Chric League Board Member listed on page 2.

Come to have fun, cajoy the entertainment and friendship AND help pay off the murigage on the the Franklin Township Civic League Community Building

Don't miss the special lasert inside ... FT Chamber Directory on pages 7 - 10

Notice to Resders

The Franklin Township Civic League appreciates the efforts of political candidates to reach Franklin Township volers by pizcing advertisements in the *informer* and will hope candidates will continue to use the paper as an ntogral part of their media strategies. However, effective Octobor 8, 2014, at the direction of the Civic League Board of Directors, the Informer will no longer accept political ads to be placed on the front page of the informer Candidates ads will gladly be accepted for placement elsewhere in the paper.

Lutheran High School's **Dave Pasch named** Colts Coach of the Week



Súbmilied photo: Aliko Prior. Youth Football Commissionar for the Indianapolla Colig, cangralulates Coasti Pasch.

Dave Pasch of Lutheran High School has been named the ColuNFL Coach of the Week, a program presented by Anthem Blue Cross and

See Ceach of the Year page 2

Harvest Dinner The Lads of Harmoon, a local chapter of 1the Derbershop Harmony Society, will provide the entertoinment this year at the Franklin Township Listorical Society's annual Horvest Dinner

Franklin

Township

Historical

Society invites

public to annual

addition to classic burbershop-stylen cr.p.://bi song., the pupular group performs

to be held Saturday, Oct. 18, at 1

See Hurvest Dinner page 3

What's Inside...

Page 4 Pass It On Coat Drive Page 6 FTCSC: News Page & Crait Fair

Page 12 DAR Meeling

FAVORITES...

Rege E-Howet Need to Know .Pcge 13 Pears Poster Contest

Page 14 Service Olymptory Page 15 Photo of the Week

862-1774 - Fax 862-1775, News: flinformer@sbcglobal.net Apvenning: flinformer-adeales@sbcglobal.net



South-Past Corner of Arlingum & Southport - REDO AM Sundays - www.franklinparkchutch.com.

## NOTES, NEWSWORTHY, NEED TO KNOW!

## LIBRARY NOTICE

The Franklin Road Library spologizes for any inconvenience but will . be cancelling the Halloween Party scheduled for Oct. 25.

## THANK YOU

A huge thank you and much appreciation to Mike Mascaril The Informer parking lot is weed free.

#### October is National Dental Hygiene Month! Tell yours thanks!



Dr. Mark Bohnert happily having his teeth cleaned by by his topnotch dental hygienist, Ronda Gra

In addition to her work at Southeast Family Dental, Ronda is an instructor at Indiana University School of Dentistry.

ONE MILLION THANKS

Third Annual Community Pop Tab Col(action

to benefit the Ronald McDonald House brings in more than 4 MILLION POP TABS

We love you Rondal

The Franklin Township Civic League, Inc., is a group of interested residents working for the common good of all those living and working within the limits of Franklin Township. It shall interest liself in working with all elected officials of Marion County, the City of Indianapolis and all other levels of government, to bring to the Township those improvements which would be expected to exist in an area located within the boundaries of a large metropolitan city, that of Indianapolis. It shall act as a voice for the people of Franklin Township to express their opinions and desires. It shall communicaté to the residents such issues that would act as assets or detriments to their common good, giving a platform for those who wish to debate the issues in a forum of open-inindedness. The League shall work with those groups already established and with those to be established in the hip which have a mutual understanding and like goals of the League membership.

FT Civic League Mission Statement

## Request a City service, report a problem

From potholes to trash Requesting Mobile Application collection, hundreds of city services are just a phone call or a click away. The Mayor's Action 4MAC (4622). Center, Requestlindy Online Portal and Requestindy Mobile for iPhone and Android offer four different ways for residents to request services and connect with city government. The one-stopshop approach takes the

guesswork out of reporting problems and helps ensure better responses, while tracking systems let users monitor the progress of

The Mayor's Action Center (MAC) provides the citizens of the lated City of Indianapolis and Marion-County with a single point of contact to request City servicés, obtain information, or provide feedback. The following are just a few of the justice that can be reported through the MAC: an be reported through and trash

Potholos, Missed trash
Abandoned vehicles, collections . Abundo

Traffic signals or signs; Zoning violations, and thany more! In an effort to provide excellent stumer service, the MAC now offers several ways for ditizen's to

request services and to theck this status of un axisting service request wound the clock through Requesting online and the free





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AVERICAL FAMILY

As always, the MAC con still be contacted by calling 317-327-



Biscuits & Gravy Saturday 7 - 12 moon Souday 8 - 11 am

Sunday 11 am - 3:30 pm Fried Chicken All the Sides Available!

862-6622

dis vith any other offers at distress



## AARON FREEMAN

ATTORNEY AT LAW

THE FREEMAN LAW OFFICE 8925 Southeastern Ave, Indianapolis, IN 46239 317-882-7011(Fax)

AARONFREEMANLAW @ GMAIL.COM

Representing your legal needs







## **VOTE NOV. 4** \$fot €

Loucila, Artisus Re 317-442-4837.

⟨☆ CAT PING. CONGRESS 7TH DISTRICT

Our 7th Congressional District Is currently being represented in Congress by Andre Carson. If you would like a change vote for Ret. Col. Cat Ping for Congress. Cat advocates for a strong union and

corporate check and balances to ensure a "Made in America"

prosperity.

Harvest Dinner continued from page 1

patriotic and gospel numbers and . dinner and concert will be held at some songs from recent decades, the New Bethel Baptist Church,

The Hervest Dianer is an autumn event sponsored by the Franklin Township Historical Society and always includes a speaker or entertainment, a variety of door prizes and a summary of the year's activities, in addition to the meal. Tickets are \$15 and

8936 Southeastern Avenue,

Indianapolis.

Reservations with payment must be received by Oct. 11 and may be mailed to: Harvest Dinner, Pranklin Towdship Historical Society, P.O.: Box 39015, Indianapolis, IN 46239. Those with questions may phone Dana

## John and Erin

In Memory of

III Many thanks to EVERYONE who helped make this annual event another HUGE success III

START SAVING NOW FOR NEXT YEAR'S Weigh the Informer to the spring for the tick-off announcement Contact Small Miracles Children's Center at 862-3014 or ullKidsInc@aal.com for more information on how you can help

## Help keep the flags flying with pride over Wanamaker and Acton

The flugs that line the streets in Wanamaker and Acton are a bright testimony to our community's patriotic pride. Volunteers refresh, reattach and replace the floes in the spring each year and we need your help to make sure our American pride the stranger of the strain of the

